

Dear FCC;

this is to oppose any REMOVAL OF RULES WHICH WOULD AMOUNT TO A reduction of the obligations of manufacturers of telecommunications equipment in providing access to people with disabilities.

As a rehabilitation engineer and BLIND consumer of such equipment for over 50 years, I have found that this industry has failed almost completely to improve such accessibility to blind people.

Nearly all such equipment, whether cell phones, telephones themselves, switch boards or any other equipment to be operated by consumers is becoming less rather than more accessible to us.

There is a growing dependence on interaction with systems in an entirely visual manner which makes it impossible for blind people to use many systems and services available to other consumers.

These laws are too weak rather than too strong, and any removal or reduction of these laws would have strongly negative effects on the employability and quality of life of disabled and particularly blind people.

In general the attitude of manufacturers and others in the industry has not changed from one which sees access as a burden.

the major loophole in these laws which allows exceptions where access is "not economically feasible" has been used as an excuse for not trying.

Not only with telecommunications equipment, but with consumer electronics in general, the first question a blind consumer must ask when selecting equipment for purchase is not:

which manufacturers product best meets my needs?

but

Is there any choice of equipment which I can operate at all.

Even in the best cases, there are rarely more than one to two choices of equipment which can be used even to a minimal degree.

THERE IS NOT ONE SINGLE FULLY ACCESSIBLE CELL PHONE AVAILABLE FOR BLIND PEOPLE TODAY!

In a personal example a digital telephone system chosen by my employers as being the most flexible on the market is inaccessible to the degree that I can only use its most basic features, and that quite often I inadvertently press a wrong button and am unable to undo a mistake since all feedback is provided by inaccessible LCD displays.

In conclusion:

Even with current rules, industry's efforts to make telecommunications equipment accessible to disabled persons are a disaster. Any reduction of the now weak rules would have serious deleterious effects on both the employability and quality of life of disabled people. Rather than reducing industry's obligations, you should remove the loopholes which allow them to avoid

EVEN MAKING A SIGNIFICANT EFFORT

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